

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
v.	:	<b>CRIMINAL NO. 21-cr-290</b>
<b>MOSES SLANGER WRIGHT</b>	:	
	:	

**GOVERNMENT’S RESPONSE TO DEFENDANT’S UNOPPOSED  
MOTION TO MODIFY CONDITIONS OF RELEASE**

The United States of America, through its attorneys, Jacqueline C. Romero, United States Attorney for the Eastern District of Pennsylvania, and Linwood C. Wright, Jr., Nelson S.T. Thayer, Jr. and Kelly M. Harrell, Assistant United States Attorneys for the district, hereby responds to the defendant’s unopposed motion to modify conditions of release. In support of its response the government avers as follows.

1) On June 23, 2022, a federal indictment was unsealed in the Eastern District of Pennsylvania charging defendant Moses Slanger Wright, with two counts of fraudulently attempting to obtain citizenship, in violation of 18 U.S.C. § 1425; three counts of fraud in immigration documents, in violation of 18 U.S.C. § 1546(a); ten counts of false statements in relation to naturalization, in violation of 18 U.S.C. § 1015(a); and thirteen counts of perjury, in violation of 18 U.S.C. § 1621. In essence, it is alleged by the government that the underlying fraud is a result of the defendant’s misrepresentations, both orally and in immigration documents, about his conduct while a combatant in Liberia’s first civil war. Trial is currently scheduled to begin on July 18, 2023.

2) The indictment's factual underpinnings encompass, among other things, prewar and wartime events that took place in Liberia as far back as approximately 35 years ago. During the entire time frame covered by the indictment that is specific to the defendant, he was a high-ranking military officer in the Armed Forces of Liberia (AFL), during certain periods serving as the AFL's commanding general. As such, he was a high-ranking government official.

3) On June 24, 2022, the defendant had his initial appearance before a United States magistrate judge in the Eastern District of Pennsylvania. The defendant was released on \$50,000 own recognizance bond with several conditions. These conditions included, among other things, electronic location monitoring and home detention.

4) On November 22, 2022, the defendant in an unopposed motion, moved this Court to modify the defendant's conditions of release in that he seeks removal of the condition of home detention. He does not seek the removal of any other condition of release. The primary basis for defendants' motion is his contention that he is "fully compliant with the current imposed conditions of release." The Court has requested a response from the government to defendant's motion.

5) As a result of the defendant's prior status as a high-ranking official in the Liberian government, as part of their discovery obligations, the prosecutors has been consulting with another United States government agency in relation to what, if any, information that other agency might have that is related to the defendant. The prosecutors have diligently been in relatively frequent consultation with that other agency. Because of various protocols the prosecutors are unable to control the pace or frequency that they have access to information that might be in the possession of that other agency. That said, the prosecutors believe that

information that might be possessed by this other government agency could be the subject of ancillary litigation in this case. If there is ancillary litigation it could impact the Court's current scheduling in this case.

6) Although the government believes that there will be sufficient evidence at trial to convict the defendant, and perhaps ultimately lead to his incarceration, he is currently in pretrial status and presumed innocent. It is the government's understanding that the defendant has complied with the various conditions of his release. If the defendant's motion is granted the government believes that sufficient conditions will remain in place to assure the defendant's appearance as required. Since, unfortunately, the resolution of this case could take longer than initially anticipated, the government is not opposed to lessening the pretrial burden on this thus far compliant defendant by not opposing his motion to modify conditions of release.

Respectfully submitted,

JACQUELINE C. ROMERO  
United States Attorney

/s/ Linwood C. Wright, Jr.  
LINWOOD C. WRIGHT, JR.  
NELSON S.T. THAYER, JR.  
KELLY M. HARRELL  
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Government's Unopposed Motion to Have Case Declared Complex, and for a Continuance of the Trial Date, was filed electronically on the Electronic Case Filing system, is available for viewing and downloading from the ECF system, and/or was served electronically on the following:

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Dated: November 30, 2022